

WEIL, GOTSHAL & MANGES LLP

Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Ray C. Schrock, P.C. (*pro hac vice*)
(ray.schrock@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER BENVENUTTI KIM LLP

Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (415) 636-9251

Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**SECOND STIPULATION BETWEEN THE
DEBTORS AND THE CALIFORNIA
STATE AGENCIES EXTENDING TIME
TO FILE MOTION PURSUANT TO FED.
R. BANKR. P. 3018(a) AND AMENDING
AMENDED ORDER ESTABLISHING
SCHEDULE FOR DISCLOSURE
STATEMENT APPROVAL AND PLAN
CONFIRMATION**

Re: Dkt. No. 5732

[No Hearing Requested]

This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), and the California Department of Forestry and Fire Protection, California Department of Toxic Substances Control, California Governor’s Office of Emergency Services, California Department of Veterans Affairs, California State University, Chico, California Department of Parks and Recreation, California Department of Transportation, and California Department of Developmental Services (collectively, the “**California State Agencies**”). The Debtors and the California State Agencies are referred to in this Stipulation and Agreement for Order collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

RECITALS

A. On February 11, 2020, the United States Bankruptcy Court for the Northern District of California (the “**Bankruptcy Court**”) entered the *Amended Order Establishing Schedule for Disclosure Statement Approval and Plan Confirmation* [Docket No. 5732] (the “**Scheduling Order**”)¹, which, among other things, scheduled the deadline for any creditor to file a motion pursuant to Bankruptcy Rule 3018(a) seeking to temporarily allow its Claim or Interest in a different amount for purposes of voting to accept or reject the Plan as March 6, 2020, at 4:00 p.m. (Prevailing Pacific Time).

B. On March 5, 2020, the Parties entered into the *Stipulation Between the Debtors and the California State Agencies Extending Time to File Motion Pursuant to Fed. R. Bankr. P. 3018(a) and Amending Amended Order Establishing Schedule for Disclosure Statement Approval and Plan Confirmation* (“**First Stipulation**”) [Dkt. No. 6108]. An order granting the First Stipulation was entered on March 5, 2020 [Dkt. No. 6137], extending the time for the

¹ Capitalized terms used but not otherwise herein defined have the meanings ascribed to such terms in the Scheduling Order.

1 California State Agencies to file and serve the 3018(a) Motion through 4:00 p.m. (Prevailing
2 Pacific Time) on March 20, 2020.

3 C. In light of ongoing negotiations between the Parties, the Parties have agreed that
4 the time for the California State Agencies to file and serve the 3018(a) Motion be continued
5 indefinitely and taken off the Court's calendar, without prejudice, pending approval of a
6 settlement between the Parties.

7 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
8 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
9 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
10 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
11 **THAT:**

12 1. The time for the California State Agencies to file and serve the 3018(a) Motion is
13 adjourned indefinitely until such time that either (1) the Court approves a settlement between the
14 Debtors and the California State Agencies, at which point the matter will be removed from the
15 calendar entirely, or (2) the Court issues a further order with respect to the scheduling of the
16 3018(a) Motion.

17 2. Except as expressly set forth herein, all other provisions of the Scheduling Order
18 shall remain in full force and effect and shall not be impacted by this Stipulation.

19 3. This Stipulation shall constitute the entire agreement and understanding of the
20 parties relating to the subject matter hereof and shall supersede all prior agreements and
21 understandings relating to the subject matter hereof.

22 4. This Stipulation may be executed in counterparts, each of which shall be deemed
23 an original but all of which together shall constitute one and the same agreement.

24 5. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
25 controversies arising from this Stipulation.
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: March 16, 2020

WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP

/s/ Thomas B. Rupp

Thomas B. Rupp

*Attorneys for Debtors
and Debtors in Possession*

Dated: March 16, 2020

FELDERSTEIN FITZGERALD
WILLOUGHBY PASCUZZI & RIOS LLP

/s/ Paul J. Pascuzzi

Paul J. Pascuzzi

Attorneys for the California State Agencies